

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Teachers4Action et al,	:	Civil Action #
	Plaintiffs	08-cv-548 (VM)(AJP)
v.	:	:
Bloomberg et al,	:	:
	Defendants.	:
	X	

**MOTION FOR FOLLOWING MISCELLANEOUS RELIEF (i) ORDER
RELIEVING ED FAGAN AS COUNSEL FOR CERTAIN PLAINTIFFS /
FORMER TEACHERS4ACTION MEMBERS, (ii) ORDER GRANTING
CHARGING LIEN PURSUANT TO NY JUDICIARY LAW § 475, (iii) ORDER
PURSUANT TO FRCP 42 (b) SEVERING FORMER TEACHERS4ACTION
MEMBER CLAIMS AND (iv) FOR OTHER RELIEF**

PLEASE TAKE NOTICE that the above referenced will move this Honorable Court, as soon as counsel can be heard, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, Courtroom 20 D, before the Honorable Andrew J. Peck, USMJ, for, among other things,

1. An Order Relieving Edward Fagan as Counsel of Record for Marie Addoo and Karen Ornstein;
2. An Order granting a charging lien, pursuant to Judiciary Law § 475 as against claims and/or potential settlements for reimbursement of pro-rata share of out of pocket expenses and *quantum meruit* value of services provided to date to/for Marie Addoo and Karen Ornstein;
3. An Order, pursuant to FRCP 42 (b), severing the claims of Marie Addoo and Karen Ornstein; and
4. For Such other and Further Relief as the Court deems just and equitable.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Movants shall rely upon the attached (i) Joint Declarations of Teachers4Action Executive Committee and (ii) Declaration / Statement of Authorities of Edward D. Fagan.

PLEASE TAKE FURTHER NOTICE that opposition, if any, should be filed in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District.

Dated: May 29, 2008
New York, NY

/s/ Edward D. Fagan (electronically signed)
Edward D. Fagan Esq.
5 Penn Plaza, 23rd Floor
New York, NY 10001
Tel. (646) 378-2225
Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing

**MOTION FOR FOLLOWING MISCELLANEOUS RELIEF (i) ORDER
RELIEVING ED FAGAN AS COUNSEL FOR CERTAIN PLAINTIFFS /
FORMER TEACHERS4ACTION MEMBERS, (ii) ORDER GRANTING
CHARGING LIEN PURSUANT TO NY JUDICIARY LAW § 475, (iii) ORDER
PURSUANT TO FRCP 42 (b) SEVERING FORMER TEACHERS4ACTION
MEMBER CLAIMS AND (iv) FOR OTHER RELIEF**

along with supporting Affidavits/Declarations and Accompanying Memorandum of Law
are being electronically filed with the Clerk of the Court.

Hard copies of the papers are being hand delivered and mailed with proof of receipt
requested to:

Marie Addoo, 59-10 Queens Blvd., Woodside, NY 11377

Karen Ornstein, 5444 Little Neck Parkway, Apt 3-D, Little Neck, NY 11362

In addition, courtesy copies of the papers will be electronically transmitted and/or mailed
to each of the counsel of record in all matters.

Dated: May 29, 2008
New York, NY

/s/ Edward D. Fagan (electronically signed)
Edward D. Fagan, Esq.